

# **EXHIBIT**

# **D**

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June 14, 2007

### VIA E-MAIL

Manatt Phelps & Phillips LLP  
11355 West Olympic Boulevard  
Los Angeles, CA 90064

Attention: Craig Ruttenberg

**Re: *Dyson Technology Ltd. and Dyson, Inc. v. Maytag Corporation, et. al.*, No. 05-434 GMS  
*Dyson Inc. v. Maytag Corporation, et al.*, No. 06-654 GMS**

Dear Craig:

This letter is in follow-up to my letter of June 6 and our phone conversations and e-mail correspondence concerning the above-referenced litigation. As we discussed, the parties to the above-referenced lawsuits agree to the following with respect to documents in the above cases.

- The parties agree to destroy all documents produced by the opposing parties in the above lawsuits.<sup>1</sup> The parties will certify in writing that all such documents have been destroyed.
- The parties agree to contact their respective experts and request the return of all Confidential or Highly Confidential documents related to the above litigation. Upon receipt of these documents, the parties agree to destroy all such documents, as well as all expert reports. The parties will certify in writing that all such documents have been destroyed.
- The parties agree to destroy all deposition transcripts and will certify in writing that all such transcripts have been destroyed.

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<sup>1</sup> Documents related to Dyson's Motion for Limited Relief from the Protective Order filed in case number 05-434 GMS may be excluded from destruction as agreed to by the parties or as ordered by the Court.

WINSTON & STRAWN LLP

Manatt Phelps & Phillips LLP

C. Ruttenberg

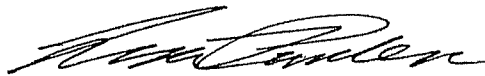
June 14, 2007

- As for documents produced by third-parties, the party who requested the third-party documents will contact the third-party to inquire as to the manner in which the third-party would like its documents disposed. The party will then notify the opposing party the manner in which the third-party documents were disposed.
- Hoover and its agents will preserve all other discovery documents for a period of 12 months from the date of the parties' settlement agreement, i.e., June 1, 2008.
- The law firms which represented the parties in this litigation: Connolly Bove Lodge & Hutz LLP, Manatt Phelps & Phillips LLP, Renner Kenner Greive Bobak Taylor & Weber, LPA, Sullivan & Cromwell LLP, Winston & Strawn LLP, and Young Conway Stargatt & Taylor LLP, will each be permitted to retain one copy of any pleading or paper filed of record with the Court, in accordance with the parties' protective orders.

The above will satisfy all requirements under the Mutual General Release and Settlement Agreement at paragraph 20, as well as the "Procedure Upon Termination of Litigation" specified in the parties' protective orders. The parties specifically waive the requirement in the Mutual General Release and Settlement Agreement to return all documents produced by the opposing parties, and instead will destroy all such documents. If for some reason a party is prohibited by law from proceeding as described above, it will promptly notify the opposing parties.

Please confirm in writing that Dyson agrees to the above.

Sincerely,



Lisa J. Parker

cc: Kimball R. Anderson  
Stephen P. Durchslag  
Anthony DiSarro  
Ronald Y. Rothstein  
Ray L. Weber  
Steven F. Reich  
Tamar Feder  
Chad Hummel  
Kathrin Wanner  
Christopher Cole  
Richard Pepperman